



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



JUL 01 2014

Mr. David Serpa
Guardian Industries, Inc.
11535 E. Mountain View Avenue
Kingsburg, CA 93631

**Re: Notice of Minor Title V Permit Modification
District Facility # C-598
Project # 1133310**

Dear Mr. Serpa:

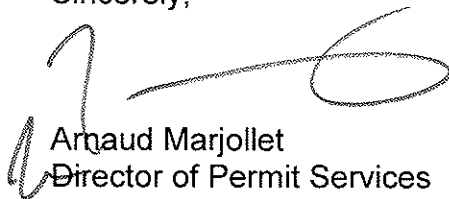
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-598-11-1 into the Title V operating permit. This ATC authorized the installation of a 2.5 MMBtu/hr LPG fired emergency flare used as a part of the glass furnace (permit C-598-4) backup fuel system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-598-11-1, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1980 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: 1133310

Engineer: Dustin Brown
Date: June 30, 2014

Facility Number: C-598
Facility Name: Guardian Industries, Inc.
Mailing Address: 11535 E. Mountain View Avenue
Kingsburg, CA 93631

Contact Name: David Serpa
Phone: (559) 896-6400

Responsible Official: David Serpa
Title: Plant Manager

I. PROPOSAL

Guardian Industries is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) C-598-11-1 into the Title V operating permit. This ATC authorized the installation of a 2.5 MMBtu/hr LPG fired emergency flare used as a part of the glass furnace (permit C-598-4) backup fuel system.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

Guardian Industries is located at 11535 E. Mountain View Avenue in Kingsburg, CA.

III. EQUIPMENT DESCRIPTION

C-598-11-2: 2.5 MMBTU/HR RANSOME MANUFACTURING LPG-FIRED TEST FLARE SERVING THE BACK-UP EMERGENCY FUEL SYSTEM FOR THE FLOAT GLASS MANUFACTURING LINE (PERMIT C-598-4)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Guardian Industries Corporation is a glass manufacturing plant. In the event of an emergency, the glass furnace (permit C-598-4) cannot be shut down without fuel flow for very long before damage is done to the glass furnace as it begins to cool down rapidly. During periods when the facility has its natural gas supply cut off, such as during natural gas curtailment, the glass furnace is fired on the backup fuel system, liquefied petroleum gas (LPG). Prior to introducing LPG into the glass furnace, the correct fuel to air mixture must be obtained (Wobbe Index). The proposed emergency flare will be used to burn LPG gas until the appropriate Wobbe index is achieved and the fuel mixture can be introduced in to the glass furnace. Typically, the appropriate Wobbe Index for LPG will be achieved within 10 minutes of first starting the unit up.

The emission increases associated with the proposed new flare are included in Attachment C.

Existing PTO Changes:

None, the proposed flare is a new permit unit.

ATC Condition Changes:

ATC condition 1 has been removed and not included in the requirements for this revised permit as Guardian Industries has submitted the appropriate Title V application(s) to incorporate this ATC in to their operating permit.

ATC condition 2 has been removed and not included in the requirements for this revised permit as ATC C-598-11-0 was cancelled and superseded by new ATC C-598-11-1 being incorporated in to the Title V permit within this project.

ATC condition 3 is already included as condition 41 of Guardian Industries' facility wide permit, C-598-0-4. Therefore, it is not necessary to include the same condition on each permit and this condition was removed and is not included in the requirements for this new permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit C-598-11-2
- B. Authority to Construct C-598-11-1
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit
C-598-11-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-598-11-2

EXPIRATION DATE: 01/31/2016

EQUIPMENT DESCRIPTION:

2.5 MMBTU/HR RANSOME MANUFACTURING TEST FLARE SERVING THE BACK-UP EMERGENCY FUEL SYSTEM FOR THE GLASS MANUFACTURING LINE (C-598-4)

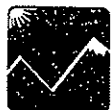
PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The flare shall only be fired on commercial LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions rates from the combustion of LPG in the flare shall not exceed any of the following limits: 0.068 lb-NOx/MMBtu, 0.0164 lb-SOx/MMBtu, 0.026 lb-PM10/MMBtu, 0.370 lb-CO/MMBtu, or 0.063 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sulfur content of gas flared shall not exceed 15 grain-S/100 scf. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
6. A flame shall be present at all times when combustible gases are vented through this flare. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
7. A flame sensing or heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be operational. [District Rule 4311] Federally Enforceable Through Title V Permit
8. Operation of the flare shall not exceed either of the following limits: 12 hours per day or 200 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall maintain records of the daily and annual duration of flare operation, amount of gas burned, the nature of the emergency situation, and copies of LPG bills. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct C-598-11-1



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: C-598-11-1

ISSUANCE DATE: 06/24/2014

LEGAL OWNER OR OPERATOR: GUARDIAN INDUSTRIES CORP
MAILING ADDRESS: 11535 E MOUNTAIN VIEW AVE
KINGSBURG, CA 93631-9211

LOCATION: 11535 E MOUNTAIN VIEW AVE
KINGSBURG, CA 93631

EQUIPMENT DESCRIPTION:

2.5 MMBTU/HR RANSOME MANUFACTURING LPG-FIRED TEST FLARE SERVING THE BACK-UP EMERGENCY FUEL SYSTEM FOR THE FLOAT GLASS MANUFACTURING LINE (PERMIT C-598-4)


CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. This Authority to Construct (ATC) cancels and supersedes ATC C-598-11-0. [District Rule 2201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. The flare shall only be fired on commercial LPG. [District Rule 2201]
7. Emissions rates from the combustion of LPG in the flare shall not exceed any of the following limits: 0.068 lb-NOx/MMBtu, 0.0164 lb-SOx/MMBtu, 0.026 lb-PM10/MMBtu, 0.370 lb-CO/MMBtu, or 0.063 lb-VOC/MMBtu. [District Rule 2201]
8. Sulfur content of gas flared shall not exceed 15 grain-S/100 scf. [District Rules 2201 and 4801]
9. A flame shall be present at all times when combustible gases are vented through this flare. [District Rules 2201 and 4311]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

10. A flame sensing or heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be operational. [District Rule 4311]
11. Operation of the flare shall not exceed either of the following limits: 12 hours per day or 200 hours per year. [District Rule 2201]
12. Permittee shall maintain records of the daily and annual duration of flare operation, amount of gas burned, the nature of the emergency situation, and copies of LPG bills. [District Rules 2201 and 4311]
13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 2201 and 4311]

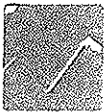
ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
C-598-11-1	34	32	185	8	13
TOTAL	34	32	185	8	13

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org

Received

DEC 02 2013
Executive Office
SJVAPCD



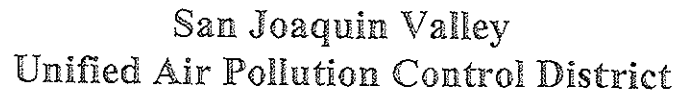
Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Guardian Industries Corp	
2. MAILING ADDRESS: STREET P.O. BOX: <u>11535 E Mountain View Ave</u> CITY: <u>Kingsburg</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93631-9233</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>11535 E Mountain View Ave</u> CITY: <u>Kingsburg</u> _____ SECTION TOWNSHIP RANGE	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Glass Manufacturing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Modification of Condition # 5 on ATC Permit No.: C-598-11-0. Alternatively, Guardian will keep records of flare operating hours during testing, emergency and maintenance to demonstrate compliance of the operating hours not to exceed the limit 200 hours/ year. Modification of Condition # 11 on ATC Permit No: C-598-11-0. Alternatively, Guardian will only use commercial grade propane that does not exceed the permit limit 15 grain-S/100scf. Remove Permit Condition No 12, 13, 14, 15 and 16.	
6. TYPE OR PRINT NAME OF APPLICANT: David Serpa	TITLE OF APPLICANT: Plant Manager
7. SIGNATURE OF APPLICANT: <i>David Serpa</i>	DATE: <u>12/2/13</u> PHONE: (559)896-6400 FAX: () EMAIL: dserpa@guardian.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <u>0</u>	CHECK#: <u>—</u>
	DATE PAID: <u>—</u>	
	PROJECT NO: <u>C-1133310</u>	FACILITY ID: <u>C-598</u>



I. TYPE OF PERMIT ACTION (Check appropriate box)

[] ADMINISTRATIVE
AMENDMENT

AMENDMENT

COMPANY NAME: Guardian Industries Corp		FACILITY ID: C - 598
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility		
2. Owner's Name: Guardian Industries Corp		
3. Agent to the Owner: David Serpa		

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

David Lopez
Signature of Responsible Official

12/2/13
Date

David Serpa

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)